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VIA FACSIMILE

March 21, 2014

The Honorable Laura Taylor Swain  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Courtroom 17C  
New York, NY 10007

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**MEMO ENDORSED**

Re: *Amplify Education, Inc. v. Greenwood Publishing Group, Inc. d/b/a  
Heinemann*, Civil Action No. 1:13-cv-02687-LTS



Dear Judge Swain:

Plaintiff Amplify Education, Inc. submits this letter on behalf of both parties to request a 3-week extension of the deadline to file the Joint Claim Terms Chart in this matter. Under Paragraph 4 of the Court's Pre-Trial Scheduling Order No. 1 (Dkt. No. 18), the parties' Joint Claim Terms Chart (pursuant to LPR 11) is currently due on May 8, 2014. In view of the Settlement Conference currently scheduled by Magistrate Judge Ronald L. Ellis for April 15, 2014 (*see* Dkt. No. 32), both Plaintiff Amplify Education, Inc. and Defendant Greenwood Publishing Group, Inc. d/b/a Heinemann wish to request an extension of the deadline to file the Joint Claim Terms Chart to May 29, 2014.

The parties have previously requested and were granted a short extension of the deadline to file and serve the Invalidity Contentions (*see* Dkt. No. 25). Further, Plaintiff has previously requested and was granted an adjournment of the Initial Conference Date (*see* Dkt. No. 6), and Defendant has previously requested and was granted an extension of time in which to file a responsive pleading to Plaintiff's Complaint (*see* Dkt. No. 9).

Both Plaintiff and Defendant respectfully request that the Court grant the requested extension, to which both parties have agreed. We thank the Court for its consideration of this matter.

Respectfully submitted,

Karolina Jesien, Esq. (KJ 7292)  
Counsel for Plaintiff Amplify Education, Inc.

cc: All Counsel of Record (via e-mail)

*The requested extension is granted.*

**SO ORDERED:**

3/24/14  
HON. LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE

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